



Jeanette Radcliffe
Secretary
Senate Community Affairs Legislation Committee

Re: Inquiry into the Social Services Legislation Amendment (Transition Mobility Allowance to the National Disability Insurance Scheme) Bill 2016

Dear Jeanette,

Thank you for your invitation to comment on the *Transition of Mobility Allowance to the National Disability Insurance Scheme) Bill 2016*.

I provide a submission in my capacity as the founding member and Chief Executive Officer of the Australian Network on Disability (AND). AND is a not-for-profit organisation resourced by its members to advance the inclusion of people with disability in all aspects of business, as well as into well paid and sustainable jobs.

I have seen first-hand the positive difference that equitable access to education and employment can make to a person with a disability, and the significant flow on effects to social and economic well-being. Given the rates of employment for people with a disability in Australia are already low, I am concerned that the proposed changes to mobility allowance simply adds another barrier participation and inclusion.

Mobility is a key aspect of economic, educational and social participation for people with a disability, and this issue is consistently identified through research as a significant barrier to those activities. As such, the proposed changes to the current Mobility Allowance does raise a number of issues, which are outlined below.

1. **The changes are administratively complex.** Why have such complex changes been proposed to a payment which is planned to be phased out upon the availability of the NDIS (which is projected to be around 3 years). I imagine the system changes to implement would be in the order of tens of millions to effect, and would then become redundant when Mobility Allowance payments cease.
2. **Cost savings from reduced payments are unlikely to be realized:** Economies of scale will also not be able to be realized based on existing customer numbers (drawn from the Department of Social Services' website). There is an estimated 71,000 recipients Australia wide in October 2016, with an estimated growth rate of 2,500-3,000 people per year. Over a three-year period that would only be around 7,500 to 9,000 new customers, plus existing customers who move off the payment or change their status - which would not cover the costs of system changes.
3. **The changes create further inequality among recipients:** For new applicants, there been a reduction in 'eligible' activities for which the allowance can be received. This effectively creates 2 classes of recipients under the existing mobility allowance (ones with a broader





- eligibility and ones with narrower eligibility). Not-with-standing the already existing inequalities in the payment system, what is the benefit in creating a two-tiered scheme among an already disadvantaged group?
4. **Activities which are not vocational training or employment seem to be excluded:** Eligible activities for payment have been narrowed. This could have flow on effects for people with a disability participating in pre-employment activities. For example, in relation to programs that AND runs, it is not clear how the new requirements would impact on a person participating in AND's Positive Action towards Career Engagement (PACE) program. People with a disability participating in PACE are not in paid employment or vocational training. Yet programs such as these clearly provide pathways to employment (and many people have gained employment after completing the PACE program).
 5. **People who are 65 years and older are not included:** new applicants for Mobility Allowance will be directed to apply for assistance as part of an aged care package which may not provide for the same flexibility around assistance for employment (as it seems to be assumed that people over 65 don't work). In an age where people are being encouraged to extend their working life this is counter intuitive.
 6. **What are arrangements for recipients where the NDIS has not commenced by 1 July 2020?**

In concluding, progressing the Bill in its current form which would seem to be both costly and duplicate effort. Consideration should be given to leaving Mobility Allowance unchanged until person transfer to the NDIS, and legislated times lines for the cessation of Mobility Allowance be removed. The narrowing of the eligibility criteria for Mobility Allowance does not recognize the benefits of participation in community and volunteer activities social inclusion or its roles as stepping stone to paid employment. Additional provision under the NDIS could be considered for people who are 65 years or older and still working.

Please call me if you have any questions about our submission.

Yours Sincerely

Ms Suzanne Colbert AM
Chief Executive Officer
October 4, 2016

